

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
                                )  
Plaintiff,                 )  
                                )  
v.                            ) Cause No. 4:15-CR00404 HEA  
                                )  
ADRIAN LEMONS             )  
                                )  
Defendant.                 )

**DEFENDANT LEMONS' TIMELY OBJECTIONS TO U.S. MAGISTRATE REPORT,  
RECOMMENDATION AND SUMMARY ORDER AND REQUEST FOR FULL *DE NOVO* HEARING**

COMES NOW Nick A. Zotos, Attorney at Law, and timely files WRITTEN OBJECTIONS to the U.S. Magistrate Judge's report, recommendation and unconstitutional and summary Order, in law and fact, and pursuant to 28 U.S.C. 636 and Rule 59 of the Federal Rules of Criminal Procedure and especially in consideration of 28 U.S.C. §53B and 28 CFR 77.3 as well as the Missouri Code of Judicial Conduct and the Missouri Rules of Professional Conduct;

COMES FURTHER NOW instant counsel and files an accompanying motion for appointment of a special independent counsel for inquiry of the legal and ethical propriety of the continued representation of Adrian Lemons by instant counsel, said motion being made a part hereof by direct reference.

WHEREFORE Defendant Lemons and his counsel timely files WRITTEN OBJECTIONS and pray that This Court grant full due process to Defendant and instant counsel and appoint independent counsel for inquiry and grant Defendant and instant counsel the full and fair *de novo* hearing to which they were PROMISED and to which they are entitled

under the Fifth and Sixth Amendments to our U.S. Constitution and for such other and further relief as This Court may deem meet and proper.

Respectfully Submitted,

/s/ Nick A. Zotos  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 22, 2016, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the attorneys of record and mailed to any non-participating attorneys in Electronic Case Filing.

/s/ Nick A. Zotos